



May 27, 2021

VIA ECF

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *New York Legal Assistance Grp. v. Board of Immigration Appeals*, No. 18-cv-9495 (PAC)

Dear Judge Crotty:

We, along with Public Citizen Litigation Group, represent the Plaintiff in the above-captioned matter. As the Court is aware, the mandate issued from the Second Circuit on May 7, 2021, and yesterday, the Court scheduled a status conference for Wednesday, June 9, 2021 at 3:15 PM, to be conducted in Your Honor's Courtroom at 500 Pearl Street. We write to respectfully request that the Court conduct this conference virtually or telephonically, or, in the alternative, that the Court grant leave for our co-counsel at Public Citizen, Scott Nelson, to participate virtually or telephonically in a live court proceeding. Mr. Nelson, whose motion for *pro hac vice* admission is pending with the Court, is located out-of-state and is unable to attend in person. Defendant has consented to this request and expressed a preference that all counsel participate remotely.

If the Court is not inclined to grant this application, undersigned counsel is prepared to appear in person on behalf of Plaintiff.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Danielle Tarantolo", is written over a light blue circular stamp.

Danielle Tarantolo  
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CC: Alexander Hogan, Assistant United States Attorney  
Scott Nelson, Public Citizen Litigation Group